

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DISH NETWORK, L.L.C.,

Plaintiff,

V.

**MOHAMMAD ATTYAH, individually
and d/b/a Tarboosh TV**

Defendant.

Case No. 1:19-cv-00542-CMH-MSN

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendant Mohammad Attyah (“Defendant”), by and through his undersigned counsel, files this unopposed motion for an extension of time to answer, plead, or otherwise respond to Plaintiff’s Complaint up to and including June 14, 2019 (“Motion”)¹. In support of this Motion, Defendant states as follows:

1. Plaintiff DISH Network, LLC, (“Plaintiff”) brings this action against Defendant for direct copyright infringement under 17 U.S.C. §501 and for inducing and materially contributing to copyright infringement under 17 U.S.C. §501. CM/ECF 1.

2. Defendant was served with the Complaint on May 6, 2019. Accordingly, Defendant's deadline for response is set for May 28, 2019.

¹ Defendant does not waive his right to file a motion to dismiss, motion to strike, motion for a more definite statement, or other pleading challenging the allegations set forth in the Complaint, including, but not limited to, objections to personal jurisdiction, defective process, or venue. Defendant expressly reserves all rights in that regard.

3. Defendant recently retained undersigned counsel and requires time in which to respond to the allegations in Plaintiff's Complaint.

4. Furthermore, Plaintiff and Defendant are in the process of discussing potential resolution of this matter.

5. On May 21, 2019, counsel for Plaintiff agreed by phone not to oppose a motion to extend Defendant's deadline for response to the Complaint to June 14, 2019.

6. The requested extension herein is not being sought for improper purposes.

7. Neither the Court nor the parties will be prejudice by the requested extension of time. This is Defendant's first request for an extension. Accordingly, granting the brief requested extension of time will not cause delay in resolving this action.

8. Counsel for Plaintiff has consented to the relief requested herein. Pursuant to Local Rule 7(F)(2)(b), no separate brief in support of this Motion is required.

WHEREFORE, for these reasons, Defendant respectfully requests that the Court grant this unopposed motion and extend Defendant's time in which to answer, plead, or otherwise respond to Plaintiff's Complaint up to and including June 14, 2019. A proposed Order accompanies this Motion.

Date: May 21, 2019

Respectfully submitted,

By Counsel

McClanahan Powers, PLLC

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2019, the foregoing *UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS* was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Claudia Lopez-Knapp
Claudia Lopez-Knapp